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cars will be in compliance and we will have completed the phase in eight months early. Please note that we have sent along a "compilation" of parts that will be necessary to meet this FMVSS. [See confidential addendum]

FMVSS 208 - 360 and 550 all models

First FNA says that the air bags have to be changed in the 550's. But it would be a "hazardous undertaking". At JKT, Not only have we changed air bags but we have designed systems from scratch and then conducted dynamic testing to prove their effectiveness. (For the record, they passed.) Please don't be misled into thinking that changing the airbags is a problem, it's not.

Next FNA goes on to say that the bumper of the European car weighs less than the U.S. car. "Who cares?" JKT modifies the rear frame and bumpers to comply with this FMVSS. There is no significant weight difference between the U.S. FNA car and JKT's car after modifications. The weight balance and ride height is also identical between JKT's modified car and FNA's car.

FNA goes on to say that the rear frames are different. We have inspected both U.S. cars and cars from other parts of the world. The frames of the cars that we have inspected are not different. They are missing several small parts which are bolted to the original holes in the course of EPA and DOT modifications. However, the structure of the frames are the same all over the world. Even bolt holes used to mount additional parts are identical and have small plastic plugs that we remove for part installation. [See confidential addendum]

It should be noted that Ferrari SPA tests to the worst standards which may not be U.S. Standards. In the case of the bumpers, for example, it is not the U.S. standards, it is the Canadian standards. (5 MPH not 2½ MPH). Ferrari FNA has not, to our knowledge, been involved directly in crash testing and this may explain some of their comments. We have submitted engineering data showing that we believe that our modifications pass this FMVSS. Unlike FNA, JKT has done extensive crash testing and systems design here, in the USA, and all data has been submitted to the OVSC for examination. [See confidential addendum]

FMVSS 214 - 550 ONLY

FNA says they have crash test data to show that 550 door bars installed from the inside don't pass. Again, "who cares?" As it could well have been the bars they were using in testing or many other reasons. We have a number of tests confirming that doorbars, when installed correctly, from the inside, do pass these dynamic and static tests. We have designed these dynamic side impact systems for several cars that we have crash tested and OVSC has seen our data and modifications. We have used the same engineering practices as used in these test vehicles for the design of the 550 and 360 door bars. It makes little difference how we install our door bars if the placement and attachment points are the same as the US bars and the function remains the same. In the case of the 550, the bars are in the stock location and are dimensionally identical to the US Ferrari bars. If FNA has data showing that our door bars don't pass they should provide such data instead of making baseless accusations. Our data and designs have been proven in dynamic testing. [See confidential addendum]

FMVSS 216 - 550 COUPE ONLY

FNA states that the 550 coupe (only) has a different roof structure in the area of the windshield frames for the USA. We have examined the areas of concern on a European 550 coupe and a U.S. model. We have provided very close pictures of the areas in question, as well as, the parts lists from Ferrari. We have designed the small additional "section" which brings these vehicles into compliance with this FMVSS. [See confidential addendum]

FMVSS 225 - 360 and 550 all models

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This is a phase in requirement that does not finish until September 1, 2002. Testing by JKT will be complete on the belt anchorage's by January of 2002. Upon completion of testing the modifications utilized will be identical to the US version of the 360 and 550 in function and will meet this FMVSS. This will bring JKT's modified vehicles into compliance with this phase in over eight months ahead of the phase in dead line.

FMVSS 301 - 360 and 550 all models

The hose that the rollover valve attaches to is the same throughout the world. If the rollover valve works then no gas goes further than this valve in an accident situation. It is true that we replace many other parts for the USEPA Standards (2-day evap.) but those parts are down stream of the rollover valve. It should be noted that even if the rollover valve failed a leak would be doubtful as it would have to fill several feet of lines, a fuel vapor separator, pass through several check valves and fill up two evaporative canisters to get out of the evaporative system through the vent hose.

40 CFR PART 581 --360 - 550 all models. (See FMVSS 208 discussion) [See confidential addendum]


Conclusion

It is our opinion that FNA has made a number of baseless accusations in their answers specifically designed to mislead using "smoke and mirrors". These accusations, such as their discussions of the bumpers, door bars, test weights and roof crush, are based in testing data they have not submitted. We do not believe that FNA has a right to throw up these walls with no supporting crash data or engineering. Parts numbers are a very poor way of comparing model changes. Parts numbers change often and can be unreliable without supporting data. We are a firm, dedicated to research and development and have submitted hundreds of thousands of pages of data, proving our modifications with sound engineering practices, on a number of vehicles, not just one make and model.

Please examine our data and assign eligibility numbers as soon as possible as time is of the essence. If there are any further questions please do not hesitate to contact us at the above referenced numbers. Thank you very much for your attention to this matter.

Sincerely,

J.K. Technologies, L.L.C.



By: Jonathan W. Weisheit, Project Engineer